

FILED
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District Court

SEP 06 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

) CIVIL ACTION No. 05- 0013
KENNETH C. COCHRANE, ERICA P.)
COCHRANE, and ACHALI K)
COCHRANE, a minor represented by)
KENNETH C. COCHRANE)
)
Plaintiffs) DEFENDANT'S CASE MANAGEMENT
) STATEMENT
v.)
)
FRANCISCO W. BORJA)
)
Defendant)
)
DATE: 9/7/05
TIME: 8:30 AM
JUDGE: ALEX R. MUNSON

Comes now defendant Francisco Borja ("Borja") who submits the following proposed
Case Management Conference Statement:

(a) Service of Process:

Defendant has been served.

(b) Jurisdiction and Venue:

Subject matter Jurisdiction and venue is proper.

(c) Track Assignment:

Standard

(d) Anticipated motions:

The motions defendant anticipate filing include, but are not limited to the following:

1. Motion to amend answer; and
2. Discovery motions;

(e) Anticipated Discovery and Limitation on Discovery:

1. Interrogatories, a request to product and a request for admissions will be served upon plaintiff by defendant.
2. Defendant anticipates taking the deposition of each; plaintiff and possibly the deposition of Erica Cochrane treating physician. Additional depositions may be necessary of other persons who are later learned to possess discoverable knowledge.

(f) Further proceedings:

Plaintiff leaves the setting of the proceedings to the court.

(g) Special Procedures:

Not necessary.

(h) Modification of the standard pre-trial procedures:

No modifications necessary.

(i) Settlement prospects:

Defendant believes settlement may be possible after conducting discovery..

(j) Limitation of issues:

No limitation is necessary, at this time.

(k) Setting of dates:

Defendants request the following dates:

1. Motions to amend and supplement pleadings filed on or before December 15, 2005;
2. All discovery served so as to be completed by March 13, 2006;
3. Discovery motions filed on or before April 6, 2006;
4. Settlement Conference on April 21, 2006;
3. All dispositive motions heard on or before May 25, 2006;
4. Final Settlement Conference on June 9, 2006;
5. Joint pre-trial order June 17, 2006
6. Final Pre-trial conference June 17, 2006; and
4. Trial date of June 26, 2005 at 9:00 a.m.

Dated this 6th day of September, 2005.

Law Office of G. Anthony Long

By: 
G. Anthony Long